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7 Attorneys for GOOGLE LLC

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendants.

CASE NO. 3:20-cv-06754-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF GOOGLE LLC'S
OPPOSITION TO SONOS, INC.'S
MOTION TO DISMISS OR TRANSFER
TO THE WESTERN DISTRICT OF
TEXAS**

1 I, Lindsay Cooper, declare and state as follows:

2 1. I am an associate at Quinn Emanuel Urquhart & Sullivan LLC representing Google
3 LLC (“Google”) in this matter. If called as a witness, I could and would testify competently to the
4 information contained herein.

5 2. Attached hereto as Exhibit 1 is a true and correct copy of the Complaint filed in the
6 International Trade Commission proceeding *Certain Audio Players and Controllers, Components*
7 *Thereof and Products Containing Same*, Inv. No. 337-TA-1191.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of the Complaint filed in
9 *Sonos, Inc. v Google LLC*, Case No. 2-20-cv-00169 (C.D. Cal.).

10 4. Attached here to as Exhibit 3 is a true and correct copy of U.S. Patent No.
11 9,219,959.

12 5. Attached here to as Exhibit 4 is a true and correct copy of Order No. 5, Setting the
13 Procedural Schedule entered in the International Trade Commission proceeding *Components*
14 *Thereof and Products Containing Same*, Inv. No. 337-TA-1191.

15 6. Attached here to as Exhibit 5 is a true and correct copy of U.S. Patent No.
16 7,899,187.

17 7. Attached here to as Exhibit 6 is a true and correct copy of U.S. Patent No.
18 8,583,489.

19 8. Attached here to as Exhibit 7 is a true and correct copy of U.S. Patent No.
20 10,140,375.

21 9. Attached here to as Exhibit 8 is a true and correct copy of U.S. Patent No.
22 7,065,206.

23 10. Attached here to as Exhibit 9 is a true and correct copy of U.S. Patent No.
24 10,229,586.

25 11. Attached here to as Exhibit 10 is a true and correct copy of the LinkedIn Profile of
26 Joni Hoadley.

27 12. Attached here to as Exhibit 11 is a true and correct copy of the LinkedIn Profile of
28 Robert A. Lambourne.

1 13. Attached hereto as Exhibit 12 is a true and correct copy of the Westlaw Public
2 Records Report of Arthur Coburn IV.

3 14. Attached hereto as Exhibit 13 is a true and correct copy of a calendar invite for a
4 “Weekly Google/Sonos Sync” sent on July 10, 2014.

5 15. Attached hereto as Exhibit 14 is a true and correct copy of a calendar invite for the
6 “Sonos/Play Music Dinner @ Cascal” on June 5, 2014.

7 16. Attached hereto as Exhibit 15 is a true and correct copy of the July 16, 2013
8 agreement between Google and Sonos.

9 17. Attached hereto as Exhibit 16 is a true and correct copy of the August 19, 2014
10 agreement between Google and Sonos.

11 18. Attached hereto as Exhibit 17 is a true and correct copy of U.S. Patent No.
12 8,239,559.

13 19. Attached hereto as Exhibit 18 is a true and correct copy of U.S. Patent Publication
14 No. 2008/0120501 A1.

15 20. Attached hereto as Exhibit 19 is a true and correct copy of U.S. Patent No.
16 7,720,686 B2.

17 21. Attached hereto as Exhibit 20 is a true and correct copy of European Patent No.
18 2986034B1.

19 22. Attached hereto as Exhibit 21 is a true and correct copy of the LinkedIn Profile of
20 Ravi Rajapakse.

21 23. Attached hereto as Exhibit 22 is a true and correct copy of the LinkedIn Profile of
22 Jan Jannink.

23 24. Attached hereto as Exhibit 23 is a true and correct copy of the LinkedIn Profile of
24 Timothy E. McGraw.

25 25. Attached hereto as Exhibit 24 is a true and correct copy of the webpage
26 <https://www.pandora.com/static/careers/location-oak.html>.

27 26. Attached hereto as Exhibit 25 is a true and correct copy of the LinkedIn Profile of
28 Andrew Volk.

1 27. Attached hereto as Exhibit 26 is a true and correct copy of the Westlaw Public
2 Records Report of Erik Reed.

3 28. Attached hereto as Exhibit 27 is a true and correct copy of the webpage
4 <https://www.dolby.com/about/support/dolby-offices-worldwide/#americas>.

5 29. Attached hereto as Exhibit 28 is a true and correct copy of the LinkedIn Profile of
6 Alan Seefeldt.

7 30. Attached here to as Exhibit 29 is a true and correct copy of Alphabet Inc.'s 2019
8 Form 10-K filed with the United States Securities and Exchange Commission.

9 31. Attached here to as Exhibit 30 is a true and correct copy of the webpage
10 <https://www.flightconnections.com/flights-to-waco-act>, which reflects the results of a search for
11 direct flights to Waco, Texas.

12 32. Attached here to as Exhibit 31 is a true and correct copy of the webpage
13 <https://www.flightconnections.com/flights-from-san-francisco-sfo>, which reflects results of a
14 search for flights from San Francisco, California to Waco, Texas.

15 33. Attached here to as Exhibit 32 is a true and correct copy of an October 2020 email
16 chain between Paige Amstutz and Clement Roberts.

17 34. Attached here to as Exhibit 33 is a true and correct copy of the Unopposed Motion
18 for Extension of Time for Defendant Google LLC to Answer or Otherwise Respond filed in
19 *Sonos, Inc. v. Google LLC*, Civil Action No. 6:20-cv-00881-ADA (W.D. Tex.).

20 35. Attached here to as Exhibit 34 is a true and correct copy of Defendant's Answer
21 and Counterclaims filed in *Evolve Techs., LLC v. Coil Winding Specialist, Inc.*, Case No. 3:18-cv-
22 00671-BEN-BGS (S.D. Cal.).

23 36. Attached here to as Exhibit 35 is a true and correct copy of the Complaint filed in
24 *MIS Sciences Corp. v. Rpost Comm. Ltd.*, Case No. 14-cv-00376-VC (N.D. Cal.).

25 37. Attached here to as Exhibit 36 is a true and correct copy of the webpage
26 <https://www.flightconnections.com/flights-from-boston-bos>, which reflects the results of searches
27 for direct flights from Boston, Massachusetts to San Francisco, California and from Boston,
28 Massachusetts to Waco, Texas.

39. Attached here to as Exhibit 38 is a true and correct copy of U.S. Patent No. 9,195,258.

40. Attached here to as Exhibit 39 is a true and correct copy of U.S. Patent No. 10,209,953.

41. Attached here to as Exhibit 40 is a true and correct copy of U.S. Patent No. 10,439,896.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on October 26, 2020, in San Francisco, California.

DATED: October 26, 2020

By: /s/ Lindsay Cooper
Lindsay Cooper

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Lindsay Cooper has concurred in the aforementioned filing.

/s/ Charles K. Verhoeven

Charles K. Verhoeven